



1090 KING GEORGES POST ROAD
SUITE 1103
EDISON, NEW JERSEY 08837
201-225-6160

C-584-08-89-108

August 25, 1989

Ms. Amy Brochu
U.S. Environmental Protection Agency
Region 2
Edison, New Jersey 08817

Re: Letter Report for Lumb Woodworking Company, EPA ID No. NYD001526243

Dear Amy:

Lumb Woodworking Company, located on 183 Smith Street in Poughkeepsie, New York, was assigned to NUS Corporation Region 2 FIT for Preliminary Assessment and authorized under TDD No. 02-8907-02. After review of the available background information for Lumb Woodworking Co., a recommendation of **NO FURTHER REMEDIAL ACTION PLANNED (NFRAP)** is proposed. The recommendation is based on the following chronology:

- On November 18, 1980, Lumb Woodworking submitted a RCRA Part A permit application, indicating treatment, storage, or disposal of hazardous waste. The company requested permission to store spent solvents in containers (process code S01).
- On February 10, 1983, Lumb Woodworking Co. responded to a letter sent by the United States Environmental Protection Agency (EPA). Lumb Woodworking informed the EPA that it is a small quantity generator, and not a treatment, storage, or disposal facility as originally stated in November 1980.
- During a New York State Department of Environmental Conservation (NYSDEC) inspection conducted on October 1, 1985, it was determined that Lumb Woodworking was a nonregulated generator and that it filed a RCRA Part A application protectively. It was noted that the company produces only one-half of a 55-gallon drum of solid waste every 5 months. The drum contained a hardened adhesive material. The report further noted that the company also produces "waste 55-gallon containers that contain adhesive resin residues". It was uncertain whether or not the hardened adhesive residue was considered to be a hazardous waste.
- Subsequent correspondence between Lumb Woodworking and the NYSDEC dated October 4, 1985 and October 22, 1985 addressed the question as to whether or not the waste adhesive coating is a hazardous material.
- An October 25, 1985 NYSDEC memo from William Buskey, Division of Solid and Hazardous Waste, to Janak Desai, Compliance Inspection Section, Division of Solid and Hazardous Waste, stated Mr. Buskey's belief that the hardened resin material is nonhazardous, and that Lumb Woodworking does not produce any hazardous waste and should no longer be on the RCRA files.
- On December 11, 1985, the NYSDEC determined that Lumb Woodworking was not subject to New York State Hazardous Waste Regulations at that time.

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Ms. Amy Brochu
U.S. Environmental Protection Agency
August 25, 1989 - Page Two

The information listed in the chronology, plus the fact that no violations have ever reportedly occurred at the facility, substantiate the recommendation of NFRAP. Attached are the references supporting this recommendation.

Very truly yours,

Robert A. Scerbo

Robert A. Scerbo

Reviewed and Approved:

Charles L. Bane

RAS/ci

Attachment

REFERENCES

1. United States Environmental Protection Agency, General Information and Hazardous Waste Permit Application Forms, Consolidated Permits Program, EPA Forms 3510-1 and 3510-3, Lumb Woodworking Company, November 18, 1980.
2. Letter from Stephen P. Lumb, General Manager, Lumb Woodworking Company, to Dr. Richard Baker, Permits Administration Branch, United States Environmental Protection Agency, February 10, 1983.
3. New York State Department of Environmental (NYSDEC), Division of Solid and Hazardous Waste, Inspection Report, Lumb Woodworking Company, October 1, 1985.
4. Letter from William Buskey, Eng. Tech./Hazardous Waste, Region 3, NYSDEC, to Peter Lumb, President, Lumb Woodworking Company, October 4, 1985.
5. Letter from Peter B. Lumb, President, Lumb Woodworking Company, to William Buskey, Eng. Tech./Hazardous Waste, Region 3, NYSDEC, October 22, 1985.
6. NYSDEC memo from William Buskey, Region 3, to Janak Desai, Compliance Inspection Section, Division Hazardous Waste, Subject: Lumb Woodworking Test Results, October 25, 1985.
7. Letter from David Mafriqi, P.E., Chief, Bureau of Hazardous Waste Operations, NYSDEC, to David Lumb, Production Manager, Lumb Woodworking, December 11, 1985.

REFERENCE NO. 1

U.S. ENVIRONMENTAL PROTECTION AGENCY		EPA I.D. NUMBER	
GENERAL INFORMATION		F N Y D 0 0 1 5 2 6	
Consolidated Permits Program (Read the "General Instructions" before starting.)		GENERAL INSTRUCTIONS	
<p>I. PERMIT NUMBER</p> <p>NYD001526243</p>		<p>If a preprinted label has been placed in the designated space, please read it carefully. If any of it is through it and enter the correct appropriate information in the space below. If the preprinted label is blank, enter the correct information in the space below.</p>	
<p>II. FACILITY NAME</p> <p>LUMB WOODWORKING CO INC</p>			
<p>III. MAILING ADDRESS</p> <p>PO BOX 352</p>			
<p>IV. LOCATION</p> <p>POUGHKEEPSIE, NY 12602</p>			
<p>V. TYPE OF FACILITY</p> <p>1. <input checked="" type="checkbox"/> Manufacturing or processing of goods or materials</p> <p>2. <input checked="" type="checkbox"/> Storage or handling of hazardous materials</p> <p>3. <input checked="" type="checkbox"/> Treatment, storage, and disposal of hazardous waste</p> <p>4. <input checked="" type="checkbox"/> Other (Specify in Part II)</p>			
<p>VI. NAME OF FACILITY</p> <p>LUMB WOODWORKING CO</p>			
<p>VII. TYPE OF PERMIT</p> <p>1. <input checked="" type="checkbox"/> Initial Permit</p> <p>2. <input type="checkbox"/> Renewal Permit</p> <p>3. <input type="checkbox"/> Modification Permit</p> <p>4. <input type="checkbox"/> Other (Specify in Part II)</p>			
<p>VIII. PERMIT NUMBER</p> <p>LUMB DAVID MGR MFG</p>		<p>9 14 4 71 05.00</p>	
<p>IX. MAILING ADDRESS</p> <p>P o B o x 352</p>			
<p>X. LOCATION</p> <p>P o u g h k e e p s i e N Y 12602</p>			
<p>XI. STREET ADDRESS OR OTHER MAILING ADDRESS</p> <p>183 Smith Street</p>			
<p>STATE</p> <p>Dutchess</p>			
<p>CITY OR TOWN</p> <p>Poughkeepsie</p>		<p>STATE N Y ZIP CODE 12601</p>	

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST		B. SECOND	
2	49.9 (specify) Manufacturer of industrial wood parts	7	(specify)
C. THIRD		D. FOURTH	
7	(specify)	7	(specify)

VIII. OPERATOR INFORMATION

A. NAME	
L U M B W O O D W O R K I N G C O	
B. TYPE OF BUSINESS (Enter the appropriate letter into the answer box. If "Other", specify.) 1 - MANUFACTURING (other than federal or state) P (specify) 2 - SERVICE (other than federal or state) 3 - OTHER (specify)	
C. STREET OR R.D. BOX	
P O B O X 3 5 2	
D. CITY OR TOWN	
P o u g h k e e p s i e	
E. STATE AND ZIP CODE	
N Y 1 2 6 0 2	

F. TYPE OF BUSINESS (continued)	
1. N. O. N. E.	2. N. O. N. E.
3. N. O. N. E.	4. N. O. N. E. (specify)
5. N. O. N. E.	6. N. O. N. E. (specify)

7. Describe in detail the operations of the business, including the location of each of its plants and facilities, the nature of the business, the products produced, the equipment used, the methods of production, and any other information that may be helpful in understanding the business. (See instructions for printing requirements.)

1. Laminate Formica type plastics to flakeboard type cores and machine to final configuration.
2. Laminate maple and other woods and machine to final part configuration.
3. Machine balsa lumber, blocks, and glued up sections per customer requirements.
4. Other wood fabrications and assemblies.

F9: $\frac{A}{51}$

I hereby certify that the information furnished on this form is true and correct to the best of my knowledge and belief, and that I am aware that this information is being furnished to the EPA for its use in the enforcement of the Federal Air Pollution Control Act, and that the information is being furnished to the EPA for its use in the enforcement of the Federal Air Pollution Control Act, and that the information is being furnished to the EPA for its use in the enforcement of the Federal Air Pollution Control Act.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
David C. Lumb - Mgr. Mfg.	David C Lumb	11-18-80

COMMENTS FOR OFFICIAL USE ONLY

D. COMMENTS FOR OFFICIAL USE ONLY (This area is for the use of the EPA and is not to be filled out by the respondent.)	
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FORM 3 RCRA		U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.)		I. EPA I.D. NUMBER F N YD 00 1 52 6																																																																									
FOR OFFICIAL USE ONLY																																																																													
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II. FIRST OR REVISED APPLICATION																																																																													
Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for you revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your EPA I.D. Number in Item I above.																																																																													
A. FIRST APPLICATION (place an "X" below and provide the appropriate date)																																																																													
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FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)																																																																													
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B. REVISED APPLICATION (place an "X" below and complete Item I above)																																																																													
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<input type="checkbox"/> 2. FACILITY HAS A RCRA PERMIT																																																																													
III. PROCESSES - CODES AND DESIGN CAPACITIES																																																																													
A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes, describe the process (including its design capacity) in the space provided on the form (Item III-C).																																																																													
B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.																																																																													
1. AMOUNT - Enter the amount.																																																																													
2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the measure used. Only the units of measure that are listed below should be used.																																																																													
<table border="1"><thead><tr><th>PROCESS</th><th>PROCESS CODE</th><th>APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY</th><th>PROCESS</th><th>PROCESS CODE</th><th>APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY</th></tr></thead><tbody><tr><td>Storage:</td><td></td><td></td><td>Treatment:</td><td></td><td></td></tr><tr><td>CONTAINER (barrel, drum, etc.)</td><td>S01</td><td>GALLONS OR LITERS</td><td>TANK</td><td>T01</td><td>GALLONS PER DAY</td></tr><tr><td>TANK</td><td>S02</td><td>GALLONS OR LITERS</td><td></td><td></td><td></td></tr><tr><td>WASTE PILE</td><td>S03</td><td>CUBIC YARDS OR CUBIC METERS</td><td>SURFACE IMPOUNDMENT</td><td>T02</td><td>GALLONS PER DAY</td></tr><tr><td>SURFACE IMPOUNDMENT</td><td>S04</td><td>GALLONS OR LITERS</td><td>INCINERATOR</td><td>T03</td><td>LITERS PER DAY</td></tr><tr><td>Disposal:</td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>INJECTION WELL</td><td>D79</td><td>GALLONS OR LITERS</td><td></td><td></td><td></td></tr><tr><td>LANDFILL</td><td>D80</td><td>ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER</td><td>OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)</td><td>T04</td><td>METRIC TONS PER HOUR</td></tr><tr><td>LAND APPLICATION</td><td>D81</td><td>ACRES OR HECTARES</td><td></td><td></td><td></td></tr><tr><td>OCEAN DISPOSAL</td><td>D82</td><td>GALLONS PER DAY OR LITERS PER DAY</td><td></td><td></td><td></td></tr><tr><td>SURFACE IMPOUNDMENT</td><td>D83</td><td>GALLONS OR LITERS</td><td></td><td></td><td></td></tr></tbody></table>						PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	Storage:			Treatment:			CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY	TANK	S02	GALLONS OR LITERS				WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY	SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	INCINERATOR	T03	LITERS PER DAY	Disposal:						INJECTION WELL	D79	GALLONS OR LITERS				LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	METRIC TONS PER HOUR	LAND APPLICATION	D81	ACRES OR HECTARES				OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY				SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
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EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons, the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.																																																																													
C. DUP																																																																													
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III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. For non-listed hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE
POUNDS	P
TONS	T

METRIC UNIT OF MEASURE	CODE
KILOGRAMS	K
METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item I to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES							
	1. PROCESS CODES (enter)						2. PROCESS DESCRIPTION (if a code is not entered in D(1))							
X-1	K	0	5	4	900	P	T	0	3	D	8	0		
X-2	D	0	0	2	400	P	T	0	3	D	8	0		
X-3	D	0	0	1	100	P	T	0	3	D	8	0		
X-4	D	0	0	2									included with above	

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY													
W N Y D O 0 1 5 2 6 2 4 3 3 1													W DUP 3 2 DUP													
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																										
WASTE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																						
				1. PROCESS CODES (enter)																						
				2. PROCESS DESCRIPTION (if a code is not entered in D(1))																						
001	D 00 1	150000	T	S 01																						Sawdust-stored then s
002	F 00 1	3832000	P	S 01																						Drum Storage
003	F 00 3		P	S 01																						
004	F 00 5		P	S 01																						
	K 00 1	10	P	S 01																						
006	P 09 0	(10)																								Included in Fool, Foo
007	U 00 2	(700)																								"
008	U 04 5	(2000)																								"
009	U 1 12	(2)																								"
010	U 12 2	(10)																								"
011	U 15 9	(50)																								"
012	U 16 0	(2)																								"
013	U 16 1	(2)																								"
014	U 1 88	(2)																								"
015	U 20 1	(2)																								"
016	U 21 0	(10)																								"
017	U 22 0	(1000)																								"
018	U 22 8	(40)																								"
019	U 23 9	(2)																								"
20																										
21																										
22																										
23																										
24																										
25																										
26																										

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)													
F	N	Y	D	O	0	1	5	2	6	2	4	T/A	C
												3	3
												6	6

FL: $\frac{A}{55}$

FL: $\frac{A}{56}$

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)						LONGITUDE (degrees, minutes, & seconds)					
	4	1	42	3	0		0	7	3	5	5
	00	00	00	00	00		00	00	00	00	00

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER				2. PHONE NO. (area co)			
E Lumb Woodworking Co.				914-471-0			
3. STREET OR P.O. BOX				4. CITY OR TOWN		5. ST.	6. ZIP CODE
F P.O. Box 352				G Poughkeepsie		N.Y.	126102

IX. OWNER CERTIFICATION

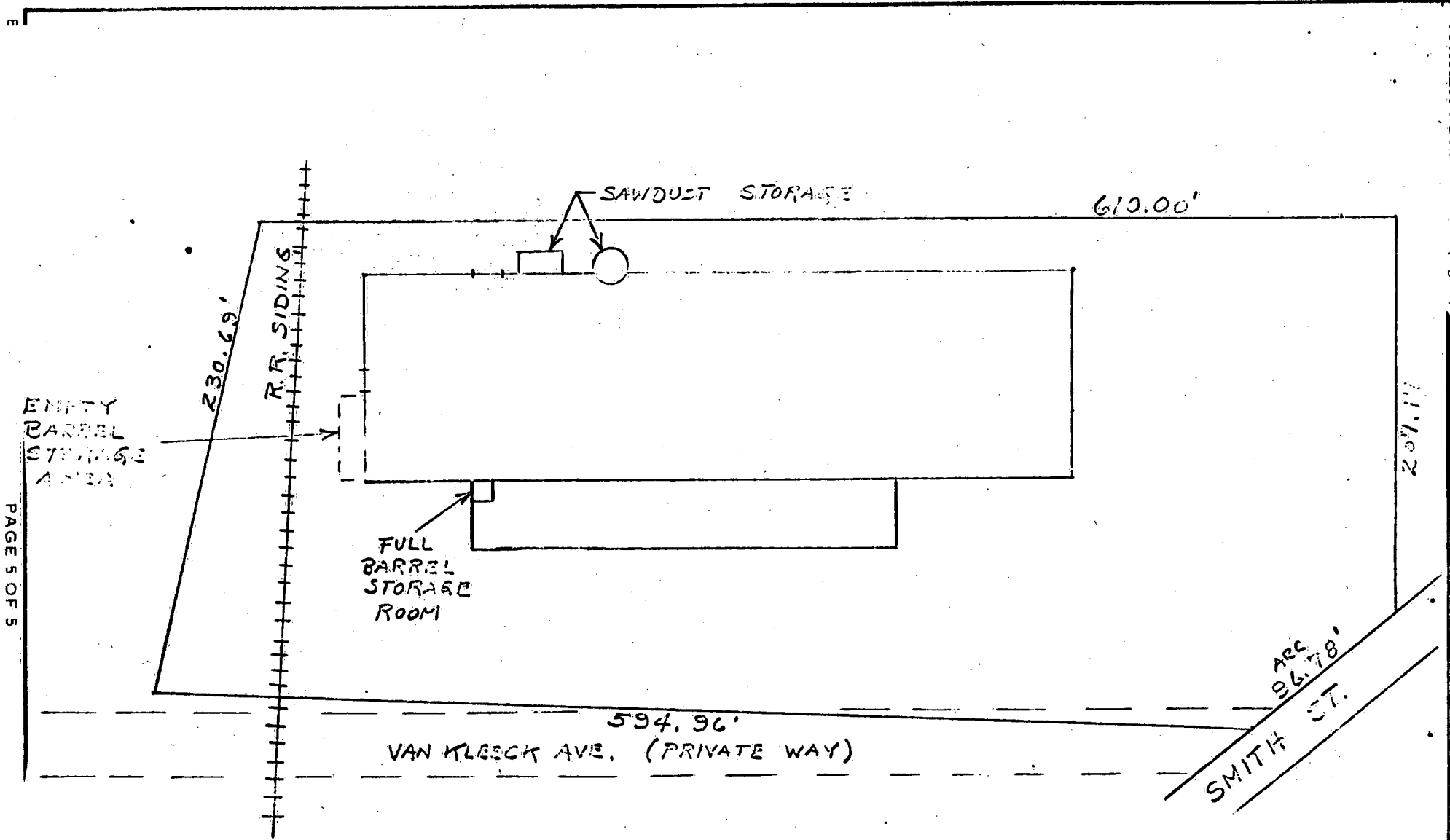
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
David C. Lumb	David C Lumb	11-18-80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
David C. Lumb	David C Lumb	11-18-80

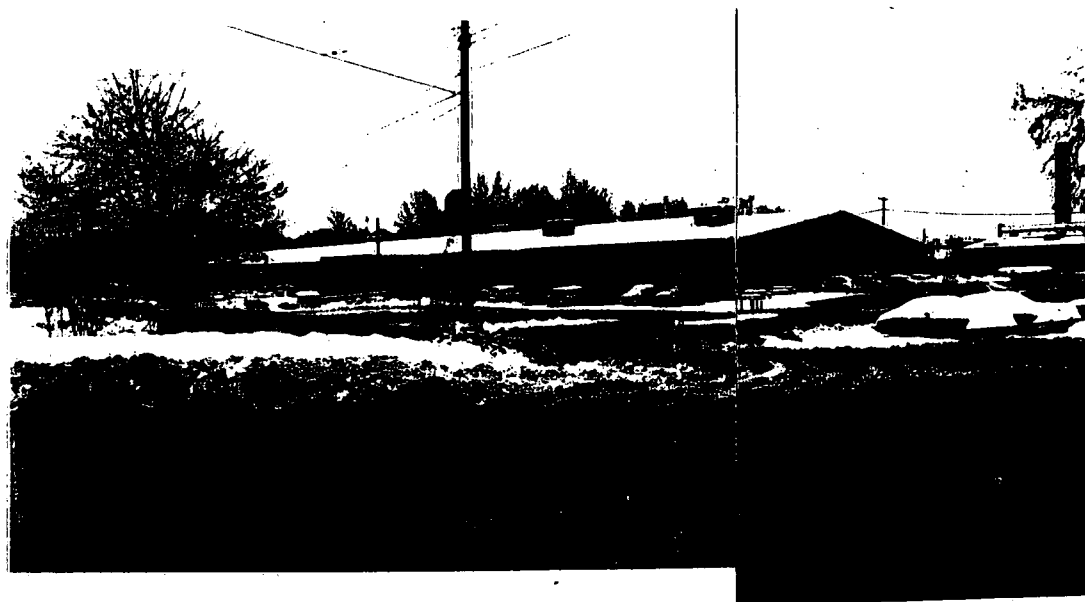


PAGE 5 OF 5

APPROX. SCALE : $\frac{1}{4}" = 20'$

SITE PLAN

LUMB WOODWORKING CO.
183 SMITH ST.
POUGHKEEPSIE, N.Y.



FACILITY
PHOTOGRAPHS
LUMB WOODWORKING Co.
183 SMITH ST.
POUGHKEEPSIE, N.Y.

NYD001526243

PHOTOS TAKEN 11-18-80



REFERENCE NO. 2



P.O. BOX 352 POUGHKEEPSIE, NEW YORK 12602 | 914 471-0500 ESTABLISHED 186

February 10, 1983

Dr. Richard Baker
Permits Administration Branch
United States Environmental Protection Agency
Region II
26 Federal Plaza
New York, New York 10278

Reference: EPA ID#NYD001526243
EPA Letter Dated 1/31/83 signed by Conrad Simon
Telephone conversation of 2/10/83 with Joseph Cvinar
of EPA

Dear Dr. Baker:

In accordance with my conversation with Mr. Cvinar, I am writing to stipulate that:

- A1. Lumb Woodworking Co., Inc. is not a storage facility for hazardous wastes.
- A2. Lumb Woodworking Co., Inc. does not store any wastes over 90 days

and to request that:

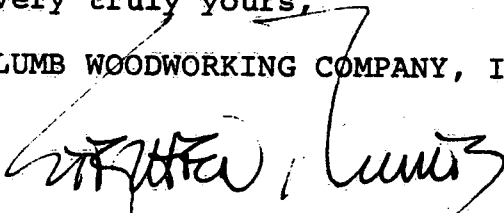
- B1. Lumb Woodworking Co., Inc. wishes to retain the EPA ID number presently assigned
- B2. Lumb Woodworking Co., Inc. wishes to be classified as a small quantity generator as stipulated on our "1981 STATUS Sheet for Non Regulated Facilities"

We assume that by this letter we are satisfying the requirements outlined in Mr. Simon's letter and that the twenty (20) day grace period has been satisfied.

If there are any questions, please contact the undersigned.

Very truly yours,

LUMB WOODWORKING COMPANY, INC.


Stephen P. Lumb
SPL:rg
Enclosure

REFERENCE NO. 3

INSPECTION FORMREGION: 3

Major: _____

Non-Major: X**NEW YORK STATE****INDUSTRIAL HAZARDOUS WASTE MANAGEMENT ACT**

(Chapter 639, Laws of 1978)



Prepared for:

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
Henry G. Williams, CommissionerDivision of Solid and Hazardous Waste
Norman H. Nosenchuck, DirectorSend to: Compliance Inspection Section
50 Wolf Road - Room 207/415
Albany, New York 12233-0001PA I.D. NUMBER: NY 0001526243HANDLER'S NAME (Corporate): Lumb Woodworking

(Division): _____

HANDLER'S MAILING ADDRESS: 183 Smith StCity & State Poughkeepsie, NY Zip Code 12602HANDLER'S LOCATION ADDRESS: _____
(if different than mailing) _____

City & State _____ Zip Code _____

HANDLER'S TELEPHONE NUMBER: (____) _____ Extension _____

FULL NAME OF HANDLER'S CONTACT: (Mr.) (Ms.) David Lumb / Peter LumbTITLE OF HANDLER'S CONTACT: Production Mgr. / PresidentHANDLER'S CONTACT ADDRESS: _____
(if different than Handler's) _____

City & State _____ Zip Code _____

HANDLER'S CONTACT TELEPHONE NUMBER: (____) _____ Extension _____
(if different than Handler's)INSPECTION DATE: Oct. 1, 1985 TIME OF INSPECTION: 9:30 a.m. p.m.COUNTY: Dutchess E/A NUMBER: _____INSPECTOR'S NAME: William BuskeyTITLE: Engineering Technician

NAME: _____

TITLE: _____

CHECK ONE: Copy of THIS report (____ has) (X has not) been given to the Handler.REPORT PREPARED BY: William A. Buskey DATE: Oct. 1, 1985REPORT APPROVED BY: Walter M. McGee DATE: 12/2/85

New York State Department of Environmental Conservation
Division of Solid and Hazardous Waste
50 Wolf Road, Albany, New York 12233

PART I

General Information and Classification of Facility

1. Identification of Hazardous Waste - 366

Yes

No

A. Is there reason to believe the facility has hazardous waste on-site? If yes, what leads you to believe it is hazardous waste? Check appropriate box/boxes and attach any applicable correspondence with DEC or EPA:

X

(1) X Company recognizes that its waste is hazardous during the inspection. *They said their waste might be hazardous. Its out for analysis*

(2) Company admitted the waste is hazardous in its RCRA notification and/or Part A permit application.

(3) EPA testing (SWA-46) has shown characteristics of:
() ignitability - 366.3(b);
() corrosivity - 366.3(c);
() reactivity - 366.3(d);
() EP toxicity - 366.3(e)

 Has revealed hazardous constituents (please attach analysis report) 366.4(a)2 (261 Appendix VIII)

(4) The material is listed in the regulations as a hazardous waste from non-specific sources 366.4b.

(5) The waste material is listed in the regulations as a hazardous waste from specific sources. 366.4c.

(6) The material or product is listed in the regulations as discarded commercial chemical products, off-specification species, containers residues and spill residues thereof. 366.4d.

(7) Company is unsure, but they have reason to believe that waste materials are hazardous. (Explain) _____

(8) If don't know, please explain: _____

____ Been granted a hazardous waste Part B permit.

If so, also complete the facility Part B (Part 360) permitted inspection report - Appendix K.

- E. Describe the activities that result in the generation of hazardous waste. Include the company's manufacturing processes. _____

This Company makes wood products such as
Ping Pong racquets and wooden ties that hold in
place the electrified third rail for electric trains.
These materials are coated in spray booths with
an adhesive coating. This material is hazardous as a
raw material but the material that is scrapped off the
spray booths is not treated or considered by the company
as being hazardous. They produce 1/2 55 gal. Drum every five months.

- F. Identify the hazardous wastes that are on-site and the quantity of each (use the identification numbers referred to in Part 366). _____

1 - 55 gal. Drum of Polyester Resin
(this material may or may not be hazardous. A sample
was taken by Sea Land Environmental Services for
analysis. If found to be hazardous it will be
sent to a secure landfill.) This material was a
raw material that hardened before it could be used.
This is not part of their normal waste stream.

- G. The handler notified EPA as a:

Generator

EPA or DEC officially modified the handlers status? If so, attach correspondence. NO

2. Status Identification:

This handler should be inspected as a (check each appropriate category after considering exemptions)

A. Transporter - complete Appendix B

B. Generator Status Identification 365.1

1. ☒ Category 1 generator - small quantity generator - generates less than 100 kg/mo and stores less than 100 kg. - 365.1(e)(1)i - Complete Part II, 1B.
2. Category 2 generator - small quantity generator - generates less than 100 kg/mo and stores more than 100 kg but less than 1,000 kg. - 365.1(e)(1)ii - Complete Part II, 1C.
3. Category 3 generator - small quantity generator - generates more than 100 kg/mo but less than 1,000 kg/mo and stores less than 1,000 kg. - 365.1(e)(1)iii - Complete Part II, 1C and 1D.
4. Category 4 generator - small quantity generator as set forth in 365.1(e)(1)iv Below - Complete Part II, 1B.
 - (a) A total of one kilogram of all commercial product or manufacturing chemical intermediate having the generic name listed in paragraph 366.4(d)5.
 - (b) A total of one kilogram of any off-specification commercial chemical product or manufacturing chemical intermediate which, if it met specifications, would have the generic name listed in paragraph 366.4(d)5.
 - (c) Any containers identified in paragraph 366.4 (d)(3) of this title that are larger than 20 liters in capacity.
 - (d) A total of 10 kilograms of inner liner from containers identified in paragraph 366.4 (d)(3) of this title.
 - (e) One hundred (100) kilograms of any residue or contaminated soil, water or other debris resulting from the cleanup of a spill, into or on any land or water, of any commercial chemical product or manufacturing chemical intermediate having the generic name listed in paragraph 366.4 (d) 5 of this title.

~~Category 5~~ generator - generated 1,000 kilograms or more per month - Complete Part II.

~~Category 6~~ generator - stores 1,000 kilograms or more - Complete Part II.

C. Statement, Storage or Disposal Facility Status

On-site accumulation of hazardous waste prior to shipment - 365.2 (a)7

1. Is hazardous waste generated and stored on-site? If so:

(a) Has hazardous waste been stored on-site longer than 90 days? 365.2 (a)(7)(i) - If yes, complete Appendix A.

(b) Has more than 8,800 gallons of hazardous waste been stored in containers? 365.2 (a)(7)(i) - If yes, complete Appendix A.

(c) Has more than 20,000 gallons of hazardous waste been stored in tanks? 365.3 (a)(7)(i) - If yes, complete Appendix A.

2. Hazardous waste received from off-site and not beneficially used, reused or legitimately recycled or stored. If yes, complete Appendix A.

3. Hazardous waste is treated on-site. 360.1(b)

4. Hazardous waste is disposed of on-site. 360.1(b)

3. Exemptions

If the handler is inspected other than as they notified (e.g., notified as generator/TSD - inspected as exempt generator) a full explanation should be included in Part III.

A. Generator Exemptions

(1) X Not a regulated handler (be sure to indicate why in Part I 1F and 1G and/or in appropriate exemption below - for example the company notified for precautionary reasons or the waste generated is not hazardous as specified in 366.1(g)(2).

(2) NA Delisted hazardous waste 366.4-366.6 IDENTIFY the waste that was delisted: (If the company is in the delisting process they are still regulated until their delisting petition is favorably approved) Complete appropriate parts depending on company status.

- (3) N/A Exemption for used engine lubricating oil. 365.1(e)2 - Complete Part II, 1B.
- (4) N/A Exemption for farmers. 365.1(e)(3). Only if he triple rinses each emptied pesticide container in accordance with paragraph 365.1(e)(3)i or 365.1(e)(3)ii, and disposes of the pesticide residues on his own farm in a manner consistent with Section 325.4(d) of this title or in a manner consistent with the disposal instructions on the pesticide label, whichever is more restrictive.
- (5) N/A Exemption for publicly owned treatment works 365.1(e)4.
- (6) N/A Samples shipped to laboratories solely for analysis. 365.1(e)5.
- (7) Residues of hazardous waste in empty containers. 365.1(e)6.
- (8) N/A A hazardous waste which is generated in a product or raw material storage tank, a product or raw material transport vehicle or vessel, a product or raw material pipeline, or in a manufacturing process unit or an associated non-waste treatment manufacturing unit is not subject to regulation until it exits the unit in which it was generated, unless the unit is a surface impoundment, or unless the hazardous waste remains in the unit more than 90 days after the unit ceases to be operated for manufacturing, or for storage or transportation of product or raw materials. 365.1(e)7.
- (9) N/A Mixed with non-hazardous waste is exempt only if unregulated quantity is mixed and the resulting mixture does not fail a characteristic test - 365.1(e)(v).

B. TSD Exemptions

1. TSD exemptions - 360.1 (f) 2 (for facilities and operations that manage hazardous waste other than waste oil)
- (a) N/A The disposal of waste pesticides on a farm by the farmer who generated them if the container or inner liner has been triple rinsed or the inner liner has been removed and the disposal method is proper - 360.1 (f)(2)(i); 365.1 (e)(3).
- (b) N/A Storage of characteristic hazardous waste prior to its beneficial use or reuse or legitimate recycling or reclamation - if the hazardous waste is not a sludge, the facility processes a valid EPA identification number, and such storage occurs off-site of the waste's generation. 360.1 (f)(2)(iv) - If yes, complete Part II, 2, 3C, 3D.
- (c) N/A Beneficial use or reuse or legitimate recycling or reclamation of hazardous waste provided that if such management occurs off-site of the waste's generation, the management is of

York State Department of Environmental Conservation
Division of Solid and Hazardous Waste
Bureau of Hazardous Waste Operations
50 Wolf Road, Albany, New York 12233

Part II

Generator Inspection Section

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

1. Requirements for Category 1-4 Generators:

Refer to questions based upon category checked in Part I.

A. ___ If in Part I an exemption applies, inspection is complete if only category company is regulated under and requirements for that exemption are met.

B. If Category 1 and 4 generators or generators exempt for used engine lubricating oil, has met the following:

___ disposed in a solid waste facility - 365.1(e)(1)(i)(a)

___ made a hazardous waste determination - 365.1(e)(1)(i)(b)

C. If Category 2 and 3 generators has met the following:

___ made a hazardous waste determination - 365.1(e)(1)(ii)(a)

___ disposed of in authorized hazardous waste facility - 365.1(e)(1)(ii)(b)

___ submitted document justifying exemption - 365.1(e)(1)(ii)(c)

___ used appropriate containers; properly packaged, labeled and marked during storage and shipment - 365.1(e)(1)(ii)(d)

___ had containers and tanks stored properly; inspected at least quarterly - 365.1(e)(1)(ii)(e)

___ had tanks designed, constructed and operated in accordance with regulations - 365.1(e)(1)(ii)(f)

___ had tanks properly sheltered and protected - 365.1(e)(1)(ii)(g)

D. If Category 3 generator, has:

___ annual report prepared - 365.1(e)(1)(iii); and

___ sent to DEC - 365.2(c)2

X
(out for analysis)

NA

Violations

Indicate:

X Satisfactory
NA Not Applicable

- (C) _____ The generator has abandoned use of a tank used to store hazardous waste and has removed from such tanks and related discharge control equipment and discharge confinement structures all hazardous waste and hazardous waste residues.

N/A

4. Manifest Records - 365.2(b)

- A. _____ It appears, from the available information, that there is a manifest copy available for each hazardous waste shipment that has been made - 365.2(b)(5)†.

If "violation" checked or "don't know," please elaborate.

- B. Describe the approximate size of an average shipment made and how many shipments per month?

- C. Each manifest (a representative sample) has the following information: - 365.3(b) and 365.3(b)(1)†

	Generator	Transporter 1	Transporter 2	TSDf
1. _____ Name of	_____	_____	_____	_____
2. _____ EPA ID No. of	_____	_____	_____	_____
3. _____ Mailing Address of	_____	_____	_____	_____
4. _____ Telephone No. of	_____	_____	_____	_____
5. _____ Manifest Document No. _____	_____	_____	_____	_____
6. _____ The proper USDOT description.				
7. _____ The appropriate _____ quantity, _____ container no. _____ container type, and _____ waste type by units of weight or volume.				

PART III

Comments, Conclusions and Recommendations Section

Facility Name Lymb Woodworking
EPA I.D. No. NY 0001526243
Date of Inspection Oct. 1, 1985

General Comments and Conclusions (cite appropriate State regulations in violation and attach additional sheets and other information as required)

This company has ~~not~~ never manifested any waste.
They had on site only one drum of a Polyester
Resin which they are having analyzed to determine if it
is hazardous or not. This was a raw material that hardened
before use and so became a waste. It is not part of their
normal waste stream. They produce 1/2 of a 55 gal. drum
every five months of a solid waste from their paint booths.
This material is a hardened adhesive. This material is thought
to be non-hazardous by the company and is sent to a Land fill.
They have not ~~analyzed~~ analyzed this waste, but even if it found
to be hazardous they are under the 100 Kg /month category and
so are unregulated. They also produce waste 55 gal. containers
that contain Adhesive Resin residues (they had 20 on site)
which is taken to the junk yard next door to the
facility (Effron) who buys the containers from them.
The resins in these empty container may or may not be hazardous.
once the material has hardened. See attached Material Safety Data Sheet
on the raw material in its liquid state. We have asked that the owner
analyze the adhesive resin residues.

III-1

Results in - Material is Non-Hazardous - BS 11/85

NOT FOR RELEASE TO COMPANY, PROTECTED INFORMATION

Recommendations EPA I.D. No. NY 0001526243

☐ Formal confidentiality is being requested.

☒ No follow-up necessary.

☐ Do you recommend that the central office wait a maximum of two weeks for you to review supplemental documents prior to determining if a warning letter should be issued?

☐ A soft warning letter should be issued.

☐ A strong warning letter should be issued.

☐ A complaint letter should be issued and a fine levied.

☐ DO NOT PROCESS, THIS COMPANY HAS BEEN REFERRED TO THE BUREAU OF ENVIRONMENTAL CONSERVATION INVESTIGATION (BECI) ON _____

(Date)

☐ Facility representative would like a copy of report (inspector submit two copies to C.O. and C.O. will send with reply)

☐ Facility representative has been given a copy of report on _____
(inspector submit one copy to C.O.)

(Date)

☒ Other (please explain)

This company is a non-regulated generator
that filed protectively. They should be removed
from the RCRA Generator list

☐ Sample(s) have been taken.

Comments on sample results: _____

MATERIAL SAFETY DATA SHEET 1/74

Required under USDL Safety and Health Regulations for Ship Repairing,
Shipbuilding, and Shipbreaking (29 CFR 1915, 1916, 1917)

SECTION I

MANUFACTURER'S NAME Columbia Cement Co., Inc.		EMERGENCY TELEPHONE NO. 516 623-6000
ADDRESS (Number, Street, City, State, and ZIP Code) 159 Hanse Ave. Freeport, New York 11520		
CHEMICAL NAME AND SYNONYMS		TRADE NAME AND SYNONYMS Con-Bond 1896
CHEMICAL FAMILY	FORMULA	

SECTION II - HAZARDOUS INGREDIENTS

PAINTS, PRESERVATIVES, & SOLVENTS	%	TLV (Units)	ALLOYS AND METALLIC COATINGS	%	TLV (Units)
PIGMENTS			BASE METAL		
CATALYST			ALLOYS		
VEHICLE			METALLIC COATINGS		
SOLVENTS Toluol	14	200 ppm	FILLER METAL PLUS COATING OR CORE FLUX		
ADDITIONAL Hexane	40	500 ppm	OTHERS		
ADDITIONAL Acetone	25	1000 "			
HAZARDOUS MIXTURES OF OTHER LIQUIDS, SOLIDS, OR GASES				%	TLV (Units)

SECTION III - PHYSICAL DATA

BOILING POINT (°F.)	IBP	134	SPECIFIC GRAVITY (H ₂ O=1)	0.75
VAPOR PRESSURE (mm Hg.) @20°C		112	PERCENT VOLATILE XXXXXXXXXX (%) By weight	79
VAPOR DENSITY (AIR=1)	Approx	3	EVAPORATION RATE (n-butyl acetate=1)	Toluol 1.9
SOLUBILITY IN WATER	Negligible			Hexane 10, Acetone 7:7
APPEARANCE AND ODOR	clear thin syrup; dyed red; pigmented pink; dyed blue			

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (Method used)	<0°F TCC	FLAMMABLE LIMITS	Lel	Uel
			1.2	12.8
EXTINGUISHING MEDIA Carbon dioxide, dry chemical; foam, vaporizing liquid, water spray or fog				
SPECIAL FIRE FIGHTING PROCEDURES				
UNUSUAL FIRE AND EXPLOSION HAZARDS vapors may cause flash fire. Use with adequate ventilation				

SECTION V - HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE	493 ppm; 8 hour time weighted average
EFFECTS OF OVEREXPOSURE	Light-headedness followed by depression of central nervous system followed by unconsciousness.
EMERGENCY AND FIRST AID PROCEDURES	Remove to open air; use artificial respiration if breathing has stopped.

SECTION VI - REACTIVITY DATA

STABILITY	UNSTABLE		CONDITIONS TO AVOID
	STABLE	X	
INCOMPATIBILITY (Materials to avoid)			
HAZARDOUS DECOMPOSITION PRODUCTS			
HAZARDOUS POLYMERIZATION	MAY OCCUR		CONDITIONS TO AVOID
	WILL NOT OCCUR	X	

SECTION VII - SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED	Return material to closed containers; ventilate area; keep all sources of ignition from area of vapors.
WASTE DISPOSAL METHOD	Bury, or allow solvent to evaporate at safe distance from habitation.

SECTION VIII - SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION (Specify type) None required when used in adequately ventilated areas. Hydrocarbon vapor cannister or self contained breathing apparatus, if needed.		
VENTILATION	LOCAL EXHAUST In coating and spraying areas	SPECIAL Explosion proof equipment
	MECHANICAL (General) Provide to control TLV	OTHER
PROTECTIVE GLOVES Not normally required		EYE PROTECTION Not normally required
OTHER PROTECTIVE EQUIPMENT		

SECTION IX - SPECIAL PRECAUTIONS

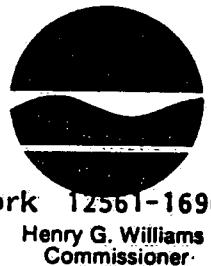
PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING	Keep away from heat, sparks or open flame.
OTHER PRECAUTIONS	Close container after use.

REFERENCE NO. 4

New York State Department of Environmental Conservation



21 South Putt Corners Road, New Paltz, New York 12561-1696
(914) 255-5453



Henry G. Williams
Commissioner

October 4, 1985

Mr. Peter Lumb, President
Lumb Wood Working
183 Smith St.
Poughkeepsie, NY 12602

Dear Mr. Lumb,

This office is requesting that the waste adhesive coating, that is generated in your spray booths, be tested to determine whether this material has a flash point less than 140°F, or burns vigorously and persistently when ignited. Please submit the results of the test to this office by December 2, 1985.

This testing is necessary to determine whether the waste adhesive coating, is a hazardous waste.

If you have any questions, please call me at (914) 255-5453.

Sincerely,

William Buskey

William Buskey
Eng. Tech./Hazardous Waste
Region 3

WB/jb

cc: James Reidy-White Plains
Aida Vasquez-New Paltz

REFERENCE NO. 5

RECEIVED

OCT 24 1985



P.O. BOX 352 POUGHKEEPSIE, NEW YORK 12602 / 914 471-0500

New Paltz
ESTABLISHED 1866

October 22, 1985

New York State
Department of Environmental Conservation
21 South Putt Corners Road
New Paltz, New York 12561-1696

Attn: William Buskey
Eng. Tech./Hazardous Waste
Region 3

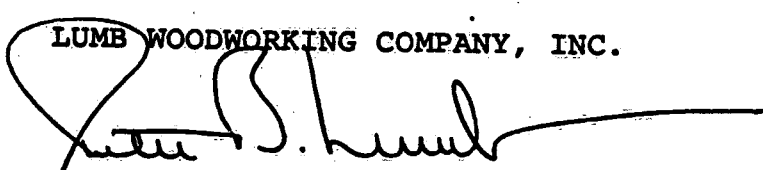
Gentlemen:

In reply to your October 4 letter requesting tests on the waste adhesive coating on our spray booth, enclosed are the results of the two tests you requested.

Please let us know if you require further information.

Very truly yours,

LUMB WOODWORKING COMPANY, INC.



Peter B. Lumb
PBL:rg
Enc.

October 17, 1985

FLASH POINT TEST

Material: Cured Strippable spray booth coating with cured contact adhesive.

Oven: Slightly under 1 cubic foot volume, electrically heated with automatic temperature control.

- Procedure:**
1. The oven was preheated to 140° F and stabilized for approximately one hour.
 2. A sample of material approximately 9 square inches was introduced and allowed to heat for about 30 minutes.
 3. The oven was opened and a lighted match was placed directly over and almost in contact with the test material. Direct contact extinguished the match.

- Results:**
1. With the lighted match over the test material there was no response (no smoke or fire)
 2. With the lighted match under an exposed edge, the sample would burn, slowly, and self extinguished when the flame was removed.

David C Lumb

David C. Lumb

October 22, 1985

BURN TEST

Material: Cured Strippable spray booth coating with cured contact adhesive.

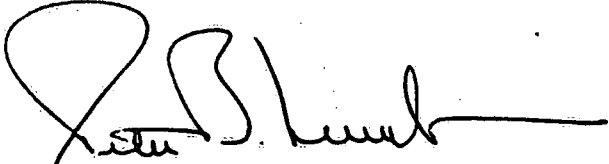
Heat Source: Butane cigarette lighter

Procedure:

1. A sample of material approximately 6 square inches at room temperature was placed directly over the butane flame.
2. The flame was held in contact with the material for approximately 10 seconds and then the flame was removed.

Results:

1. When the material was in direct contact with the flame it burned slowly.
2. When the flame was removed, the material self-extinguished.



Peter B. Lumb

REFERENCE NO. 6

SPEED MEMO

TO: Janak Desai

DATE: 10/25/85

Compliance Inspection Section

Division Hazardous waste

SUBJECT: Lumb Woodworking

Test Results

FROM: William Buskey Reg. 3

Here are the results of the tests I requested Lumb Woodworking to perform. The material tested was a solid and I wondered, at the time of the inspection, if it would burn. While the tests were not performed at an independent lab, I'm satisfied that the material in question is non-hazardous. This material is currently being accepted by a town landfill. Lumb Woodworking does not produce any hazardous waste and should be taken off the RCRA files.

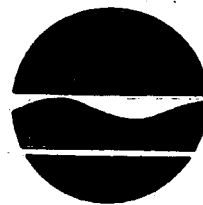
cc Aida Vespquez ✓

James Reidy

REFERENCE NO. 7

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233-0001

RECEIVED



DEC 11 1985

Henry G. Williams
Commissioner

WL#10 32.1

WHITE PLAINS

DEC 11 1985

Mr. David Lumb
Production Manager
Lumb Woodworking
183 Smith Street
Poughkeepsie, New York 12602

RE: Hazardous Waste Compliance Inspection Date: October 1, 1985
Location of Handler: Same as Above

EPA Identification Number: NYD001526243

Dear Mr. Lumb:

In order to determine compliance with the New York State Hazardous Waste Regulations, the New York State Department of Environmental Conservation conducted an inspection of your facility on the above referenced date.

It has been determined that your facility is not subject to the New York State Hazardous Waste Regulations at this time. A copy of the Inspection Form is enclosed for your records.

Thank you for your cooperation.

Sincerely,

David A. Blachman for

David Mafrici, P.E.
Chief
Bureau of Hazardous Waste Operations
Division of Solid and Hazardous Waste

Enclosure

cc: w/o enc. - Ms. Judith Ferry, Regional Attorney, Region 3
Mr. James Reidy, Regional Hazardous Waste Engineer, Region 3
Mr. William A. Buskey, Inspector, Region 3
New York State Department of Environmental Conservation

Mr. Janakrai M. Desai, Reviewer, Central Office
New York State Department of Environmental Conservation